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PLEASE REPLY TO ROSELAND, NJ

March 19, 2013

### VIA ECF AND FIRST-CLASS MAIL

Honorable Esther Salas, U.S.D.J.  
United States District Court for the District of New Jersey  
Martin Luther King Jr. Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: **Nautilus Neurosciences, Inc., et al. v. Wockhardt USA LLC, et al.**  
**Civil Action No. 2:11-cv-1997 (ES/SCM)**  
**Civil Action No. 2:12-cv-1243 (ES/SCM)**

Dear Judge Salas:

This firm, together with Willkie Farr & Gallagher LLP, represents Plaintiffs Nautilus Neurosciences, Inc. and APR Applied Pharma Research SA (collectively, "Plaintiffs") in connection with the above referenced matters. We write to respectfully request a conference call with Your Honor to discuss the scheduling of a trial in this matter.

As Your Honor is aware, the parties are presently engaged in expert discovery, which is scheduled to close on April 22, 2013. (Dkt. No. 95). The current scheduling Order provides that the deadlines for the submission of a proposed Final Pretrial Order, Motions *in Limine*, and Pretrial Briefs and the Trial Start Date are yet to be determined. The expiration of the 30-month statutory stay relating to this Hatch-Waxman litigation will take place later this year, on September 1, 2013. As Your Honor is aware, subject to Your Honor's calendar, completion of a trial prior to the

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expiration of the statutory stay could obviate the need for any emergent, preliminary injunction proceedings in this matter.

For that reason, and in consideration of the upcoming close of expert discovery, Plaintiffs respectfully request a conference call with Your Honor to discuss the scheduling of pretrial submissions and conferences as well as the trial, at the Court's convenience and subject to Your Honor's calendar. We presently have a status conference call scheduled before Judge Mannion on April 17, 2013 and will be happy to discuss these scheduling issues with His Honor, as well.

As always, we appreciate the Court's attention to this matter.

Respectfully submitted,

*s/Liza M. Walsh*

Liza M. Walsh

cc: Honorable Steven C. Mannion, U.S.M.J. (via ECF and First-Class Mail)  
All Counsel of Record (via ECF and email)